

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

**MELTON ETIENNE, et al.,
Individually and on behalf
of others similarly situated**

CASE NO: 6:15-cv-00462

JUDGE RICHARD T. HAIK, SR.

V.

**FARMERS INSURANCE COMPANY MAGISTRATE JUDGE C. MICHAEL HILL
and CENTURY 21 CENTENNIAL
INSURANCE COMPANY**

**FIRST SUPPLEMENTAL AND AMENDING COMPLAINT FOR PROPERTY
DAMAGES, PENALTIES, ATTORNEYS FEES, AND FOR CLASS CERTIFICATION**

Complainant Melton Etienne, through Undersigned counsel, pursuant to FRCP 15, individually and on behalf of others similarly situated, timely supplements and amends his original Petition filed in State Court on January 15, 2015 and Supplements and Amends his original Petition as follows:

- I. The complaint of Melton Etienne, individually and on behalf of others similarly situated, through Undersigned counsel, specifically repeats and reiterates any and all of the allegations set forth in the original Petition filed in United States District Court for the Western District on January 15, 2015 with the certain Supplements and Amendments set forth below.

I(A) made Defendants herein are the following Defendant insurers:

- 1) 21st Century Centennial Insurance Company;
- 2) Farmers Insurance Company, Inc.;

II(B) While these newly named Defendant insurers are related to the insurers originally named, and acted in concert with them, Century 21 Centennial Insurance Company/Farmer Insurance Company, the style of the original Petition should be regarded as including the

newly designated Defendant insurers, precisely as indicated and designated in this Supplement and Amendment;

III(C) The policy of insurance at issue herein in this cause of action was issued directly by Defendant 21st Century Centennial Insurance Company, a written contractual agreement signed by Complainant and Defendant 21st Century Centennial Insurance Company (21st), but Farmers Insurance Company Inc. is independent and related simultaneously to 21st, and should, therefore, be included as a Defendant.

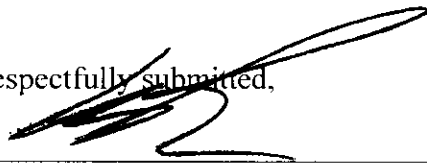
IV(D) As a written contract under Louisiana law, the Petition/Complaint of Complainant Melton Etienne was timely filed, well beyond any conceivable prescriptive period;

V(E) Reiterating and reurging the allegations of his original Complaint, Complainant Melton Etienne prays that this, his First Supplemental and Amending Complaint for Property Damages, Penalties, Attorneys Fees, and for Class Certification be granted;

VI. Defendants, through their attorneys of record have no objection to the filing of this "First Supplemental and Amending Complaint for Property Damages, Penalties, Attorneys Fees, and for Class Certification."

Wherefore, Complainant prays for all other just and equitable relief.

Respectfully submitted,



Kenneth D. St. Pe, APLC
Kenneth D. St. Pe
La. Bar Roll No. 22638
311 W. University Ave., Suite A
Lafayette, LA 70506
(337) 534-4043

George F. Riess (#11266)
228 St. Charles Ave, Suite 1224
New Orleans, LA 70130
(504) 568-1962

John Randall Whaley (#25930)
3112 Valley Creek Drive, Ste D
Baton Rouge, LA 70808
Telephone: 225-302-8810
Telecopier: 225-302-8814

The Murray Law Firm
Stephen B. Murray, Sr.
La Bar Roll No. 9858
Stephen B. Murray, Jr.
La. Bar Roll No. 23877
Arthur M. Murray
La. Bar Roll No. 27694
650 Poydras Street, Suite 2150
New Orleans, LA 70130
(504) 525-8100

Law Offices of Kenneth W. DeJean
Kenneth W. DeJean
La. Bar Roll No. 04817
Post Office Box 4325
Lafayette, LA 70502-4325
Telephone: (337) 235-5294
Facsimile: (337) 235-1095
kwdejean@kwdejean.com

ATTORNEYS FOR PLAINTIFF

PLEASE SERVE COUNSEL FOR DEFENDANTS,

Virginia Dodd
Phelps Dunbar Law Firm
II City Plaza
400 Convention Street, Suite 1100
Baton Rouge, Louisiana 70802-5618

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing pleading has been served on all parties through their counsel of record by sending them a copy via electronic mail, this 1st day of April, 2015

A handwritten signature in black ink, appearing to be "Kenneth St. Pe", written over a horizontal line.

Kenneth St. Pe